## REMARKS

Applicant hereby responds to the Office Action dated April 20, 2005 in the above-referenced patent application. Claims 1-53 are pending in the above-referenced patent application. All of the claims were rejected. Specifically, Claims 1-2, 4-5, 9-10, 12, 17-19, 21-22, 26-27, 32-33, 35-37, 39-40, 44-45, 50, 51 and 53 were rejected under 35 U.S.C. 102(e) as being anticipated by USPN 6,011,909 to Newlin et al. ("Newlin"). Claims 3, 20 and 38 were rejected under 35 U.S.C. 103(a) as being unpatenable over Newlin in view of USPN 5,579,308 to Humpleman. Claims 6-8, 11, 13-16, 23-25, 28-31, 34, 41-43, 46-49 and 52 were rejected under 35 U.S.C. 103(a) as being unpatenable over Newlin in view of USPN 6,101,530 to Rosenberg at el ("Rosenberg"). Independent Claims 1, 18 and 36 have been amended to further clarify the claimed limitations.

**Rejection of claims under 35 U.S.C. 102(e)**

Rejection of Claims 1-2, 4-5, 9-10, 12, 17-19, 21-22, 26-27, 32-33, 35-37, 39-40, 44-45, 50, 51 and 53 under 35 U.S.C. 102(e) as being anticipated by Newlin is respectfully traversed because the reference does not disclose all of the claimed limitations

Newlin is not related to the present invention, and is non-analogues art. Newlin is directed to alerting a user engaged in a first communications session on a first communication network, to a request to establish a second communications session on a second communication network. Specifically, Newlin provides conflict resolution capability or prioritization between

potential conflicting uses involving different and independent communication networks. Multimedia communications with multiple network functionality preferably are under local control, rather than network control. (Abstract).

As such, Newlin has nothing to do with device communication and control in a first network connected to a second (external) network. Specifically, Newlin has nothing to do with a method for providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network providing services, as claimed herein.

**As per Claim 1**, it is respectfully submitted that Newlin does not disclose a method for providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network providing services, as claimed herein.

Further, Newlin does not disclose that a device in the first network performs the steps of: "obtaining information from one or more of said first devices currently connected to the first network, said information including device information comprising graphical user interface information for user interaction with that device, ," as required by Claim 1. The Examiner interprets col. 3, lines 42-50 and col. 4, lines 30-43 of Newlin to disclose such limitations. Applicant respectfully disagrees with such interpretation.

The Examiner's interpretation of Newlin is lacking. For example, it is not clear what the Examiner considers in Newlin to be the first network and second networks claimed herein. Nevertheless, Newlin itself explicitly states that in Fig. 1, the device 110 is connected to first, second and third communication networks 200, 210 and 220, respectively (col. 3, lines 5-11). The device 110 includes a user/audio interface 135 that is connected to phones 185 and PC 190, and receives control signals from phones 185 and PC 190, such as off hook, on hook, flash, various DTMF tones from the phones 185, or other programmed or programmable control signals, such as control signals input from the 190 (col. 3, lines 42-50).

Newlin does not disclose that a device in any of the networks 200, 210 or 220 obtains information from one or more of devices currently connected to the first network, as claimed herein. There is no such disclosure in passages in col. 3, lines 42-50 and col. 4, lines 30-43, of Newlin or elsewhere. On top of page 3 of the Office Action, the Examiner states that in those passages: "Newlin discloses the user obtaining control signals from telephones connected to a PSTN. These signals represent the telephone being off hook, on hook, flash, call type, etc." Applicant is at a loss as to how such disclosure in Newlin anticipates the claimed limitations. This interpretation of Newlin is simply incorrect.

In col. 3, lines 42-50 and col. 4, lines 1-15 and 28-43 (relied on by the Examiner), Newlin states:

> The processor arrangement 143 is also connected to a user interface such as user/audio *interface 135, which provides for audio input and output* (via telephones 185), *and also provides for the reception or entry of a plurality of control signals*, discussed in greater detail below, which may include control signals input from a telephone 185, such as off hook, on hook, flash, various DTMF tones, or other programmed or programmable control signals, such as control signals input from a personal computer (PC) 190. (Newlin col. 3, lines 42-50, emphasis added)
>
> In the preferred embodiment, as discussed in greater detail below, *the processor arrangement 143 is responsive* through a set of program instructions, when operably coupled (i.e., turned on and powered up), *to determine a presence of a first network communication session, to further determine an occurrence of a second network signal*, **and upon the occurrence of the second network signal during the first network communication session, to provide a *distinctive alert* to *the user interface*** (such as user/audio interface 135) during the first network communication session indicating the occurrence of the second network signal. The distinctive alert, for example, may be a special audio tone transmitted to a telephone 185, or may be a video caller identification displayed on one of the video displays 170. (Newlin, col. 4, lines 1-15, emphasis added)
>
> The distinctive alert generated by the processor arrangement 143 may have a variety of forms. For example, ***the distinctive alert for a PSTN 220 call may include*** caller identification information, which may be displayed on a separate device or displayed on one of the video displays 170. Such PSTN caller identification information is typically transmitted as inband FSK modulated data, which may then be demodulated (by the telephony interface 130) and decoded by the processor arrangement 143 for subsequent display. ISDN caller identification is typically included in Q.931 signaling information, which also may be parsed and presented to the user. In addition, certain callers (far end or remote parties) may also be identified or registered as video conferencing capable, which may also be utilized to indicate that an incoming call is a video call. (Newlin, col. 4, lines 28-43, emphasis added).

As such, despite the Examiner's statement, the user in Newlin does not obtain telephone signals from telephones connected to PSTN 220, where the signals represent the telephone being off hook, on hook, flash, call type, etc. As the above quoted passages clearly spell out, in Newlin, the telephones 185 are connected to the interface 135, not the PSTN 220. When the processor 143 of device 110 detects an incoming signal from PSTN 220, the processor 143 provides a

distinctive alert to the user interface. Further, the interface 135 is connected to phones 185, wherein *the interface 135* receives control signals from phones 185 such as off hook, on hook, flash, various DTMF tones from the phones 185 (col. 3, lines 42-48). And, the signals from the phones 185 are not from the PSTN 220.

Further, the signals off hook, on hook, flash, various DTMF tones from the phones 185 (relied on by the Examiner), are not "device information comprising graphical user interface information for user interaction with that device," as claimed herein. The aforementioned signals from the phones 185 are not graphical user interface information from the phones 185.

Further, Newlin does not disclose: "generating a graphical user interface description based on the graphical user interface information, ... wherein the graphical user interface description allows displaying a graphical user interface to a user for controlling the devices that are currently connected to the first network and furnishing services of the second network, via the graphical user interface," as required by Claim 1.

In col. 4, lines 57-61 (relied on by the Examiner), Newlin states:

> As indicated above, this functionality is under the local control of the user, through the entry of the various control signals, not under network control. This is accomplished through the user/audio interface 135, which captures and interprets any control signals entered by the user, through the voice digital signal processor (DSP) discussed in the related applications.

Newlin goes on in col. 4, line 61 to col. 5 line 2, to state:

> For example, if a control signal is a flash signal, such as the flash signal that currently in use for call waiting, rather than transmit the flash signal to a network as is currently done, the user/audio interface 135 captures and interprets the flash control signal locally only, to provide for functionality across the various separate and independent networks (rather than strictly within a one, given network).

Therefore, it is clear from the above passages that Newlin does not disclose generating a graphical user interface description based on the obtained graphical user interface information, as claimed. The signals off hook, on hook, flash, various DTMF tones from the phones 185 are not graphical user interface information for user interaction with that device, as claimed. The interface 135 in Newlin does not use these signals to generate a graphical user interface description, as claimed, because there is no graphical user interface content in the signals from the phones 185. There is no disclosure in Newlin of generating such a graphical user interface description that allows displaying a graphical user interface for controlling the devices that are currently connected to the first network and furnishing services of the second network to at least a user, as claimed. Simply put, the interface 135 in Newlin does not generate a graphical user interface based on the control signals from the phones 185 for a user to control the phones 185.

On page 3 of the Office Action, the Examiner states that: "column 4, lines 57-61; Newlin discloses the user having control of this functionality through the entry of various control signals, not under network control. This enables the user to maintain two separate and independent communication sessions such as an IDSN video cal and a POTS telephone call." Even if Newlin describes such features, these features do not disclose generating such a graphical user interface description that allows displaying a graphical user interface for controlling the devices that are

currently connected to the first network and furnishing services of the second network to at least a user using the user interface, as claimed. The interface 135 in Newlin does not generate a graphical user interface based on the control signals from the phones 185 for a user to control the phones 185. Nor does the user interface 135 generate a graphical user interface that allows furnishing of the services of other networks to a user. The processor 143 and interface 135 in Newlin simply provide incoming call alerts to the user so the user can determine locally what to do with the incoming calls (Newlin, col. 5, lines 2-10).

Further, Newlin does not disclose: "the graphical user interface description including: (1) at least one reference associated with the device information of each of said one or more first devices, and (2) at least one reference associated with the services provided by the second network," as required by Claim 1.

The Examiner relies on Newlin, col. 4, lines 12-16, 35-41; col. 6, lines 25-40 for the proposition that Newlin discloses a graphical user interface description including at least one reference associated with the device information of each of said one or more first devices. The Examiner states the Newlin discloses determining a call type, audio or video based on a ringing pattern. However, nowhere in Newlin is it disclosed that a graphical user interface description includes a reference associated with the device information of each of said one or more first devices. The Examiner has failed to clearly delineate a first network and a second network in Newlin as claimed herein. Further, determining a call type, audio or video based on a ringing

pattern has nothing to do with a user interface description which includes a reference to device information stored in a device. The interface 135 does not generate a user interface description which includes a reference to the device information of the phones 185. Applicant respectfully requests that the Examiner explain what determining a call type, audio or video based on a ringing pattern has to do with generating a graphical user interface description including a reference associated with the device information of devices in a first network, as claimed herein?

The Examiner further relies on Newlin, col. 4, lines 57-61 for the proposition that Newlin discloses a graphical user interface description including at least one reference associated with the services provided by the second network. The Examiner states the Newlin discloses providing a distinctive alert to the user interface indicating the occurrence of a second network signal. Again, Applicant respectfully requests that the Examiner explain what providing a distinctive alert to the user interface indicating the occurrence of a second network signal has to do with generating a graphical user interface description including a reference associated with services provided by the second network, as claimed herein?

As is clear from Newlin, no user interface description is disclosed as claimed. Newlin's providing an event alert to a user interface has nothing to do with generating a user interface description as claimed. The Patent Office has not met its burden of explaining how providing an alert in Newlin is remotely related to generating a user interface description as claimed.

Independent **Claims 18 and 36** were rejected for the same reasons as Claim 1, and should therefore be allowed for at least the reasons provided in relation to Claim 1.

**As per Claims 2, 19 and 37**, in col. 5, lines 5-10 (relied on by the Examiner) or elsewhere in Newlin, there is no mention of a 1394 network and a non-1394 network as claimed.

**As per Claims 4, 21 and 39**, as discussed, the Examiner has not delineated what the second network is in Newlin to begin with. Newlin does not disclose: "the second network comprises a plurality of interconnected second devices providing one or more services," as claimed. If the Examiner disagrees, Applicant respectfully requests that the Examiner define the first and second network in Newlin, and then specify where Newlin discloses the claimed limitations for the second network.

**As per Claims 5, 22 and 40**, as discussed, the Examiner has not delineated what the second network is in Newlin to begin with. Newlin does not disclose: "each of said second devices comprises at least one computer system programmed to provide services," as claimed. If the Examiner disagrees, Applicant respectfully requests that the Examiner define the first and second network in Newlin, and then specify where Newlin discloses the claimed limitations for the second network. In col. 3, lines 5-13, 42-50 and col. 4, lines 30-40, 60-63, Newlin does not disclose the claimed limitations as the Examiner has not specified what the second network is in Newlin.

**As per Claims 9, 26 and 44**, Newlin, col. 4, lines 5-13 (relied on by the Examiner) does not disclose: "displaying a user interface based on said user interface description on a device connected to the first network capable of displaying a user interface, for user control of said first devices and communication with the second network," as claimed. As discussed in relation to Claim 1, Newlin does not disclose a graphical user interface description, not use of a graphical user interface by a user to control devices.

**As per Claims 10, 27 and 45**, as discussed in relation to Claim 1, Newlin does not disclose a graphical user interface description, not use of a graphical user interface by a user to control devices. Further Newlin (col. 4, lines 28-43, 6-67; col. 5, lines 1-5; col. 4, lines 28-43; col. 3, lines 41-50; col. 3, lines 41-45, lines 50-55, relied on by the Examiner), does not disclose:

> "using each reference in the corresponding user interface description to access the associated information in each first device;
>
> using each reference associated with services provided by the second network to access corresponding service information;
>
> generating the user interface including: (1) information corresponding to each first device using the accessed information in each first device, and (2) service information; and
>
> displaying the user interface on said device capable of displaying a user interface," as claimed.

There is simply no user interface description in Newlin which includes references that are user to access various devices. Applicant respectfully requests that the Examiner point to specific language in Newlin that discloses a user interface description as claimed. Newlin col. 4, lines 28-43, discussed above, mentions that a distinctive alert generated by the processor arrangement 143 may have a variety of forms. However, this has nothing to do with using each reference in the corresponding user interface description to access the associated information in each first device, as claimed herein. Newlin col. 4, lines 6-67 and col. 5, lines 1-5, discussed above, does not disclose using each reference associated with services provided by the second network to access corresponding service information, as claimed. Newlin col. 4, lines 28-43, discussed above, does not disclose generating the user interface including information corresponding to each first device using the accessed information in each first device. Newlin col. 3, lines 41-50, discussed above, does not disclose generating the user interface including service information. Newlin col. 3, lines 41-45, lines 50-55, does not disclose displaying such a graphical user interface on said device capable of displaying a user interface. The Examiner has not pointed to any graphical user interface in Newlin that is even remotely similar to the claimed graphical user interface.

**As per Claims 12, 35 and 53**, Newlin does not disclose that the device information in each device in the first network includes a user interface description for user interaction with that device, and the service information in the second network includes at least a user interface

description for user interaction with a service. Clearly, the phones 185 do not have graphical user interface description information stored in them to provide. Further, for the reasons provided above, the passages in Newlin col. 3, lines 45-50, col. 6, lines 20-30 and 35-47 (relied on by the Examiner), have nothing to do with the claimed limitations. In Newlin, the directory number or various alert types are not graphical user interface descriptions that are in the devices for user interaction with the devices.

**As per Claims 17, 32 and 50**, as discussed, the Examiner has not delineated what the second network is Newlin to begin with. In col. 3, lines 5-24, col. 3, lines 30-40, and col. 4, lines 15-27 (relied on by the Examiner), Newlin does not disclose:

> "the second network comprises a plurality of interconnected computer systems programmed to provide services;
>
> the first portal comprises one or more of said computer systems providing services of the first portal; and
>
> the second portal comprises one or more of said computer systems providing services of the second portal," as claimed.

If the Examiner disagrees, Applicant respectfully requests that the Examiner define the first and second network in Newlin, and then specify where Newlin discloses the claimed limitations. Further, there is no discussion of portals in Newlin. There is no need for devices in the networks 200, 210 and 220 to communicate with one another through a portal. Further, the

device 110 simply uses the interface 115 which is not a portal, to communicate with the networks 200, 210 and 220.

**As per Claims 33 and 51**, Newlin does not disclose that: "said at least one reference associated with the services provided by the external network is predetermined," as claimed. There is no such disclosure in col. 4, lines 7-15 of Newlin which discusses distinctive alerts. As discussed, Newlin does not even disclose a user interface description that includes references to devices.

**Rejection of claims under 35 U.S.C. 103(a)**

Rejection of **Claims 3, 20 and 38** under 35 U.S.C. 103(a) as being unpatenable over Newlin in view of Humpleman is respectfully traversed because the references, alone or in combination, do not disclose all of the claimed limitations.

Further, Humpleman was invented by employees of Samsung Electronics Co., Ltd., and the inventors assigned the original application to Samsung Electronics Co., Ltd., as set forth in the Patent Assignment recorded at reel 007771, frame 0523. The above-captioned patent application was also invented by employees of Samsung Electronics Co., Ltd., and the inventors assigned the captioned patent application as set forth in the Patent Assignment recorded at reel 011008, frame 0617.

Applicant certifies that the subject matter of Humpleman and the claimed invention of the above-captioned application were, at the time the claimed invention of the captioned application was made, owned by or subject to an obligation of assignment to Samsung Electronics Co., Ltd. Subject matter developed by another person, which qualifies as prior art only under one or more of sections (e), (f) and (g) of Section 102, shall not preclude patentability under Section 103 where the subject matter and the claimed invention were, at the time the invention was made, owned by the same person or subject to an obligation of assignment to the same person. 35 U.S.C. 103(a). As a result, Humpleman cannot be used to sustain the rejections in the Office Action. Therefore, Applicant respectfully requests that the rejection of Claims 3, 20 and 38 should be withdrawn. If Humpleman is not removed as a reference, Applicant reserves the right to present further arguments in support of allowability of Claims 3, 20 and 38.

Rejection of Claims 6-8, 11, 13-16, 23-25, 28-31, 34, 41-43, 46-49 and 52 under 35 U.S.C. 103(a) as being unpatenable over Newlin in view of Rosenberg, is respectfully traversed because the references, alone or in combination, do not disclose all of the claimed limitations.

**As per Claim 6, 23 and 41**, as discussed, the Examiner has not delineated what the second network is in Newlin to begin with. Further, Newlin does not disclose limitations of Claim 4 from which Claim 6 depends. Further, Newlin does not disclose that "the second network comprises the Internet, and at least one of said second devices providing services comprises one or more web servers providing services," as required by Claim 6. However, the

Examiner states that using a Web server is obvious as known by those skilled in the art because Rosenberg mentions web servers. Rejection of Claim 6 is respectfully traversed. The references do not provide any motivation to combine them. Nor is there a reason to modify Newlin to include web servers.

Rosenberg is simply directed to a method for providing force feedback over a network supporting TCP/IP protocols by: (a) sending from a client computer over a network supporting TCP/IP protocols, a connection request to a web server connected to the network that is hosting a desired URL; (b) receiving and processing an HTML file at the client computer that was sent from the web server in response to the connection request, wherein the processing includes parsing an embedded force object reference having associated parameters and building a force object therefrom; (c) developing a force feedback signal with the force object; and (d) providing force feedback to a human/computer interface device coupled to the client computer in response to the force feedback signal. A networked force feedback system of the present invention includes a network, a first computer coupled to the network, and a second computer coupled to the network, where the second computer includes a visual display and a human/computer interface device capable of providing a second computer input and providing force feedback in response to a force feedback signal provided by the second computer. The second computer develops an image on the visual display that is associated with stored feedback information, such that the second computer produces the force feedback signal in response to at least one of information derived from the first computer and of the second computer input. (Abstract).

As with Newlin, Rosenberg is non-analogous art and has nothing to do with a method for providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network providing services, the user interfaces for controlling the devices that are currently connected to the first network and furnishing services of the second network to at least a user, as claimed.

It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). Neither of the references suggests the motivation to modify or combine the references as proposed. The references are individually complete and functionally independent for their limited specific purposes and there would be no reason to make the modification proposed by the Examiner. Therefore, because neither of the prior art references suggests the combination and modifications proposed by the Examiner for the combination and modifications are improper.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Examiner admits that Newlin does not teach all limitations in Claim 6. Therefore, the Examiner attempts to modify Newlin in order to teach Applicants' claimed invention. However, as discussed, there is no teaching in the references of the claimed limitations. Newlin is non-analogous art. Accordingly, the effort required to combine the teachings of the references would require a substantial undertaking and numerous elements which would not be obvious.

Further, Applicant respectfully submits that the Examiner is improperly using "hindsight" and the teachings of Applicant's own claimed invention in order to combine references to render Applicants' claims obvious. The Examiner admits that Newlin fails to teach all of the limitations of Applicant's claimed invention. However, the Examiner improperly attempts to modify Newlin using Rosenberg (which also fails to teach all of the limitations of Applicant's claimed invention), in an attempt to achieve Applicant's claimed invention. Therefore, for at least the above reasons, Claim 6 is patentably distinct from the cited references, alone or in combination. Accordingly, rejection of Claims 6, 23, 41, and dependent claims therefrom, should be withdrawn.

**As per Claims 7, 24 and 42**, as discussed, the Examiner has not delineated what the second network is in Newlin to begin with. Further, Newlin does not disclose the limitations of

Claim 6 from which Claim 7 depends. Further, Newlin does not disclose that "a service provided by at least one of the devices connected to the second network comprises a web site service," as required by Claim 7. Nor does Rosenberg disclose such limitations. As discussed, Rosenberg is simply directed to a method for providing force feedback over a network supporting TCP/IP protocols.

As such, as with Newlin, Rosenberg has nothing to do with a method for providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network providing services, the user interfaces for controlling the devices that are currently connected to the first network and furnishing services of the second network to at least a user, as claimed.

Neither of the references suggests the motivation to modify or combine the references as proposed. The references are individually complete and functionally independent for their limited specific purposes and there would be no reason to make the modification proposed by the Examiner. Therefore, because neither of the prior art references suggests the combination and modifications proposed by the Examiner the combination and modifications are improper.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Examiner admits that Newlin does not teach all limitations in Claim 7. Therefore, the Examiner to modify Newlin in order to teach Applicants' claimed

invention. However, as discussed, there is no teaching in the references of the claimed limitations. Newlin is non-analogous art. Accordingly, the effort required to combine the teachings of the references would require a substantial undertaking and numerous elements which would not be obvious.

Further, Applicant respectfully submits that the Examiner is improperly using "hindsight" and the teachings of Applicant's own claimed invention in order to combine references to render Applicants' claims obvious. The Examiner admits that Newlin fails to teach all of the limitations of Applicant's claimed invention. However, the Examiner improperly attempts to modify Newlin using Rosenberg (which also fails to teach all of the limitations of Applicant's claimed invention), in an attempt to achieve Applicant's claimed invention. Therefore, for at least the above reasons, Claim 7 is patentably distinct from the cited references, alone or in combination. Accordingly, rejection of Claims 7, 24, 42, and dependent claims therefrom, should be withdrawn.

**As per Claims 8, 25 and 43**, as discussed, the Examiner has not delineated what the second network is in Newlin to begin with. Further, Newlin does not disclose a user interface description as claimed. And, as the Examiner states, Newlin does not disclose that each reference in the user interface description associated to services provided by the second network comprises at least one hyper-text link to service information in the second network. Nor does Rosenberg disclose such limitations. As discussed, Rosenberg is simply directed to a method for

providing force feedback over a network supporting TCP/IP protocols. Further, in col. 3, lines 25-30, col. 5, lines 1-3, 38-41, 44-46, and Abstract (relied on by the Examiner), Rosenberg does not even mention a hyper-text link. Nor is there a mention of a hyper-text link to service information in the second network. As such, a combination of Newlin and Rosenberg does not yield the claimed limitations. And, for the reasons provided in relation to Claim 6, Newlin and Rosenberg cannot even be legally combined. For at least these reasons, rejection of Claims 8, 25 and 43 should be withdrawn.

As per **Claims 11, 34 and 52**, as discussed, the Examiner has not delineated what the first and seconds networks are in Newlin to begin with. Further, Newlin does not disclose a user interface description as claimed. And, as the Examiner states, Newlin does not disclose that the step of generating a user interface description further comprises the steps of associating a hyper-text link with the device information of one or more of said first devices, and associating at least a hyper-text link with the service information provided by the second network. Nor does Rosenberg disclose such limitations. In col. 3, lines 25-30, col. 5, lines 1-3, 38-41, 44-46, and Abstract (relied on by the Examiner), Rosenberg does not even mention a hyper-text link. Nor is there a mention of a hyper-text link to first devices in a first network and hyper-text link to service information in the second network. As such, a combination of Newlin and Rosenberg does not yield the claimed limitations. And, for the reasons provided in relation to Claim 6, Newlin and Rosenberg cannot even be legally combined. For at least these reasons, rejection of Claims 11, 34 and 52 should be withdrawn.

**As per Claims 13, 28 and 46**, as discussed, the Examiner has not delineated what the first and seconds networks are in Newlin to begin with. Further, Newlin does not disclose a user interface description as claimed. And, as the Examiner states, Newlin does not disclose that each reference associated with services provided by the second network comprises at least one hyper-text link to service information in the second network, wherein the service information comprises at least identification information representing a service. Nor does Rosenberg disclose such limitations. In col. 3, lines 25-30, col. 5, lines 1-3, 38-41, 44-46, and Abstract (relied on by the Examiner), Rosenberg does not even mention a hyper-text link. Nor is there a mention of each reference associated with services provided by the second network comprises at least one hyper-text link to service information in the second network, wherein the service information comprises at least identification information representing a service. As such, a combination of Newlin and Rosenberg does not yield the claimed limitations. And, for the reasons provided in relation to Claim 6, Newlin and Rosenberg cannot even be legally combined. For at least these reasons, rejection of Claims 13, 28 and 46 should be withdrawn.

As per Claims **14, 29 and 47**, as discussed, Newlin does not disclose a user interface description as claimed. And, as the Examiner states, Newlin does not disclose that the identification information comprises a logo information file including a link to a logo graphic representing the service. Nor does Rosenberg disclose such limitations. In col. 3, lines 25-30, col. 5, lines 1-3, 38-41, 44-46, and Abstract (relied on by the Examiner), Rosenberg does not

even mention a link to graphic information. Nor is there any mention of logo anywhere in Rosenberg. And, Rosenberg does not disclose that the identification information comprises a logo information file including a link to a logo graphic representing the service. As such, a combination of Newlin and Rosenberg does not yield the claimed limitations. And, for the reasons provided in relation to Claim 6, Newlin and Rosenberg cannot even be legally combined. For at least these reasons, rejection of Claims 14, 29 and 47 should be withdrawn.

**As per Claims 15, 30 and 48**, the Examiner has not delineated what the first and second networks are in Newlin to begin with. Further, as the Examiner also states, Newlin does not disclose that the second network includes at least a first portal for providing services, and a reference associated with services provided by the second network comprises at least one hyper-text link to said first portal, wherein the first portal includes service information comprising at least identification information representing said services provided by the first portal. Nor does Rosenberg disclose such limitations. In col. 3, lines 25-30, col. 5, lines 1-3, 38-41, 44-46, and Abstract (relied on by the Examiner), Rosenberg does not even mention portals. Nor is there any mention of portals anywhere in Rosenberg. And, Rosenberg does not disclose that the second network includes at least a first portal for providing services, and a reference associated with services provided by the second network comprises at least one hyper-text link to said first portal, wherein the first portal includes service information comprising at least identification information representing said services provided by the first portal. As such, a combination of Newlin and Rosenberg does not yield the claimed limitations. And, for the reasons provided in

relation to Claim 6, Newlin and Rosenberg cannot even be legally combined. For at least these reasons, rejection of Claims 15, 30 and 48 should be withdrawn.

**As per Claims 16, 31 and 49**, the Examiner has not delineated what the first and second networks are in Newlin to begin with. Nor has the Examiner shown that the references alone or in combination even mention portals. Further, as the Examiner also states, Newlin does not disclose that the identification information in the first portal further comprises a hyper-link to service information provided by a second portal in the second network. Nor does Rosenberg disclose such limitations. In col. 3, lines 25-30, col. 5, lines 1-3, 38-41, 44-46, and Abstract (relied on by the Examiner), Rosenberg does not even mention hyper-links or portals. Nor is there any mention of such limitations anywhere in Rosenberg. And, Rosenberg does not disclose that the identification information in the first portal further comprises a hyper-link to service information provided by a second portal in the second network. As such, a combination of Newlin and Rosenberg does not yield the claimed limitations. And, for the reasons provided in relation to Claim 6, Newlin and Rosenberg cannot even be legally combined. For at least these reasons, rejection of Claims 16, 31 and 49 should be withdrawn.

## CONCLUSION

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For these and other reasons, it is respectfully submitted that the rejection of the claims should be withdrawn, and all of the claims be allowed. Accordingly, reexamination, reconsideration and allowance of all the claims are respectfully requested.

Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: MS Amendment Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

July 20, 2005.

By: Sarah A. Nielsen

Sarah A Nielsen

Signature

Respectfully submitted,

7/20/05

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